

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA) Case No.: 2:21-MJ-00173-EJY
) Dept.: 7D
Plaintiff,)
vs.) **STIPULATION AND ORDER TO**
) **CONTINUE BENCH TRIAL**
KEN FREEMAN)
)
Defendant.)
)
)
)

COMES NOW the Defendant, KEN FREEMAN by and through his attorney of record, GEORGE E. CROMER, ESQ., and the Plaintiff, UNITED STATES OF AMERICA, by and through their attorney of record, RACHEL KENT, ESQ., and hereby stipulate and agree as follows:

WHEREAS, this matter is currently scheduled for a Bench Trial on Wednesday, April 28, 2021 at 9:00 a.m., and

WHEREAS, this matter is currently scheduled for a Preliminary Hearing on Tuesday, May 4, 2021 at 4:00 p.m., and

WHEREAS, counsel in this matter have agreed to continue this hearing for sixty (60) days, after the Preliminary Hearing to a date convenient to the parties involved and the Court now, therefore,

WHEREAS, the defendant is not in custody and agrees to the continuance.

WHEREAS, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United

1 States Code, Section 3161 (h)(7)(A), considering the factors under Title 18, United States Code,
2 Section 3161(h)(7)(B)(I), (iv).

3 **IT IS HEREBY STIPULATED AND AGREED** that the Bench Trial hearing currently
4 scheduled for Wednesday, April 28, 2021 shall be continued for sixty (60) days, to a date
5 convenient to all parties.
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8 GEORGE E. CROMER, ESQ.

CHRISTOPHER CHIOU, ESQ.
U.S. ATTORNEY'S OFFICE

9
10 /s/ George E. Cromer
11 George E. Cromer, Esq.
12 Nevada Bar No. 000183
601 South 1th Street
13 Las Vegas NV 89101
Attorney for Defendant
14 Dated: 4/21/2021

/s/ Rachel Kent
Rachel Kent, Esq.
501 Las Vegas Blvd. South
Las Vegas NV 89101
Attorney for Plaintiff
Dated: 4/21/2021

15
16 **ORDER**

17 Based upon the foregoing Stipulation and for good cause appearing:

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19 **IT IS HEREBY ORDERED** that the Bench Trial currently scheduled for Wednesday,
20 April 28, 2021 shall be continued to July 7, 2021 at 9:00 a.m., in Courtroom 3D.

21 Dated this 21st day of April, 2021.

22 Clayton J. Zouchak
23 U.S. MAGISTRATE JUDGE
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